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Federal Communications Commission
Washington, D.C. 20554
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In the Matter of)	FEDERAL COMMUNICATIONS COMMISSION
)	OFFICE OF THE SECRETARY
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Connecticut Department of Public Utility)	RM No. 9258
Control Petition for Rulemaking and to Amend)	
the Commission's Rules Prohibiting)	
Technology-Specific or Service-Specific Area)	
Code Overlays)	
)	
Massachusetts Department of)	NSD File No. L-99-17
Telecommunications and Energy)	
Petition for Waiver to Implement a Technology-Specific)	
Overlay in the 508, 617, 781, and 978 Area)	
Codes)	
)	
California Public Utilities Commission and the)	NSD File No. L-99-36
People of the State of California)	
Petition for Waiver to Implement a Technology-Specific)	
or Service-Specific Area Code)	

**REPLY COMMENTS OF
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**REPLY COMMENTS OF
ALLEGIANCE TELECOM, INC.**

Allegiance Telecom, Inc. ("Allegiance"), by its attorneys, hereby files its reply comments in the above-captioned proceeding.

I. INTRODUCTION AND SUMMARY

As a facilities-based competitive local exchange carrier ("CLEC") that provides service in many of the nation's largest metropolitan areas, Allegiance is acutely aware of the difficulties faced by this Commission and state commissions in ensuring that (1) adequate numbering resources are available to all carriers on a nondiscriminatory basis and (2) consumer inconvenience is minimized. Allegiance has participated in numbering proceedings before this Commission and several state commissions, including California, Illinois, and New York.

Allegiance also has extensive experience in implementing local number portability ("LNP"), and Allegiance has volunteered to participate in number pooling trials in Illinois and New York.

In these reply comments, Allegiance submits that to the extent the Commission delegates additional numbering administration authority to state commissions or the North American Numbering Plan Administrator ("NANPA"), the Commission should utilize the framework outlined in its *Pennsylvania Order*,¹ which balances the needs of national uniformity and local flexibility. In accordance with the *Pennsylvania Order*, the Commission should require that states implement inexpensive, competitively-neutral methods of NXX conservation prior to implementing conservation methods that are more burdensome on carriers, especially new entrants. Also, while Allegiance supports adding discipline to the number allocation process, the Commission should be careful to ensure that administrative requirements of the NANPA do not inadvertently delay the deployment of new competitive telecommunications services.

II. THE NEED FOR NATIONAL UNIFORMITY SUGGESTS THAT THE COMMISSION SHOULD REAFFIRM THE UNDERLYING PRINCIPLES OF ITS *PENNSYLVANIA ORDER*

Maximizing the utilization of the North American Numbering Plan's ("NANP's") finite resources requires that "the Commission, state commission, and the industry ... work together to bring about ... national methods to conserve and promote efficient use of numbers."²

¹ *Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, Memorandum Opinion and Order and Order on Reconsideration, 13 FCC Rcd 19009 (1998) ("*Pennsylvania Order*").

² *Id.* at ¶ 21.

Indeed, the need for national uniformity will likely increase as pressure on the NANP's resources increases, which is why essentially all parties filing initial comments in this proceeding, including state commissions, support continued Commission leadership in the area of numbering administration.³ Because of the importance of national uniformity, Allegiance submits that the Commission should reaffirm its commitment to the principles outlined in the *Pennsylvania Order*, and establish in this proceeding national numbering policies that provide additional, measured flexibility to the state commissions and the NANPA.

In the *Pennsylvania Order*, the Commission stated that the deployment of numbering resources should: (1) facilitate efficient market entry by all telecommunications providers; (2) not favor any particular industry segment or group of consumers; and (3) not favor any particular technology.⁴ The Commission noted that these principles apply to entities exercising delegated numbering authority, including state commissions implementing area code relief through geographic split, boundary realignment, or overlay.⁵ The *Pennsylvania Order* reasonably expanded the authority delegated to state commissions by permitting, in limited instances, NXX code rationing and the imposition of NXX usage thresholds. The Commission also encouraged states to conduct number pooling trials and suggested that it would consider

³ See, e.g., Virginia State Corporation Commission at 5 (noting that "[n]umbering for telecommunications carriers is akin to assigning frequencies from the wavelength spectrum [-] [b]oth are national in scope and therefore should be the responsibility of the FCC"). See also, Pennsylvania Public Utility Commission ("PaPUC") at 15 (stating that the Commission should promulgate national rules for number pooling).

⁴ *Pennsylvania Order* at ¶ 6.

⁵ *Id.* at ¶ 8.

establishing nationwide pooling guidelines based on a recommendation from the North American Numbering Council.⁶

In the *Pennsylvania Order*, the Commission expanded authority delegated to state commissions in a measured manner, consistent with the Commission's baseline principles of competitive and technological neutrality. Allegiance suggests that these same fundamental principles should guide the Commission in delegating any additional numbering authority to state commissions or the NANPA.

III. THE COMMISSION SHOULD REQUIRE THAT STATES FULLY IMPLEMENT NON-LNP-BASED CONSERVATION METHODS PRIOR TO OR CONCURRENT WITH LNP-BASED MEASURES

As noted, one of the Commission's stated goals in administering numbering resources is to facilitate market entry of telecommunications service providers. In accordance with this principle, Allegiance supports those parties that call for the implementation of non-LNP-based conservation measures, including rate center consolidation, concurrent with or prior to the implementation of LNP-based measures, such as thousands-block number pooling ("TBNP"). In addition, the Commission should require implementation of ten-digit dialing when a geographic split occurs. As for TBNP, the Commission should ensure that carriers can obtain at least one full NXX per number plan area ("NPA") and should require TBNP only for additional "growth" NXXs in cases where carriers do not meet required NXX fill rates.

⁶ *Id.* at ¶ 27.

A. The Commission Should Require Rate Center Consolidation Prior To Or Concurrent With Number TBNP And Other LNP-Based Conservation Measures

The record of this proceeding demonstrates that competitive and incumbent carriers favor rate center consolidation over essentially all other number conservation methods.⁷ In its *NPRM*, the Commission noted that rate center consolidation “is a vitally important long-term measure to optimize the utilization of number resources” that “should be implemented to the greatest extent possible.”⁸ Indeed, rate center consolidation “enables carriers to maintain their existing call-routing and call-rating methods, is competitively neutral, does not require ... LNP, and does not preclude the adoption of other numbering optimization methods.”⁹ Because of the immediate numbering resource relief produced by rate center consolidation, Allegiance agrees that “rate center consolidation should necessarily precede moving to pooling in an area.”¹⁰ However, rate center consolidation could occur concurrently with the implementation of number pooling, as concurrent rate center consolidation would minimize the extent to which pooling is required by expanding the footprint of existing NXXs.

At present, state commissions have the authority to consolidate rate centers.¹¹

While some state commissions, such as the Texas Public Utility Commission, have fully

⁷ See, e.g., AT&T at 33; BellSouth at 7; Cablevision Lightpath at 7; Connect Communications at 14; RCN at 10; SBC at 107; Time Warner at 10; WinStar at 11.

⁸ *Number Resource Optimization*, Notice of Proposed Rulemaking, CC Docket No. 99-200, ¶ 116 (rel. June 2, 1999) (“*NPRM*”).

⁹ *NPRM* at ¶ 114.

¹⁰ *Id.* at ¶ 120.

¹¹ See, e.g., BellSouth at 6.

embraced and successfully implemented rate center consolidation, others have been less receptive. The California Public Utility Commission, for example, believes that any consolidation of rate centers could result in a rate increase for California consumers, and thus should not be favored as a means of numbering conservation.¹²

While rate center consolidation has caused nominal local rate increases in some states, consumers have benefited from larger local calling areas. Allegiance also notes that price pressure created by competitive entry should make incumbents cautious about seeking rate increases, especially for toll service. Indeed, the introduction of intraLATA toll dialing parity has resulted in substantial competition for toll services, and incumbents have generally responded to this competition by decreasing their toll rates. Moreover, in areas where rate center consolidation averts the need for number pooling, consumers will avoid LNP charges associated with number pooling, the cost recovery of which is featured prominently in several parties initial comments.¹³ Thus, Allegiance believes it unlikely that rate center consolidation would cause any meaningful change in overall consumer rates.

Given the substantial consensus of commenters in favor of rate center consolidation and the unlikelihood of adverse affects on consumers, Allegiance submits that the Commission should require state commissions to implement rate center consolidation prior to or concurrent with LNP-based number conservation measures.

¹² California Public Utility Commission at 7.

¹³ See, e.g., BellSouth at 25 (noting that if number pooling is required, incumbents should be permitted to recover associated LNP costs through a "modification" of the LNP end user line charge). See also, SBC at 89 (stating that "[b]ecause TBNP is such an expensive option to implement, it is absolutely essential that the Commission provide an adequate method for all carriers to recover all of the implementation costs associated with TBNP").

B. The Commission Should Implement A Ten-Digit Dialing Requirement For Geographic Splits To Expand the Number of Useable NXX Codes Created Through Area Code Relief

In addition to encouraging rate center consolidation, Allegiance also agrees with the commenters that suggest the Commission should work with the states to implement ten-digit dialing. The Commission's current rules require the implementation of ten-digit dialing when a state commission uses an overlay to provide area code relief, and Allegiance believes this rule should be expanded to geographic splits. The implementation of ten-digit dialing has occurred in many areas, and the success of ten-digit dialing implementation demonstrates that consumer inconvenience can be minimized. Requiring ten-digit dialing when geographic splits occur would also add a tremendous amount of flexibility to current conservation efforts and set the stage for eventual NANP expansion.

Mandatory ten-digit dialing frees up numbering resources by reclaiming "protected" NXX codes.¹⁴ To retain seven-digit dialing in local calling areas that straddle more than one NPA, states have protected numerous NXXs when implementing geographic splits. Requiring ten-digit dialing in when a geographic split occurs would literally free up millions of additional telephone numbers. For example, AT&T notes that the upcoming implementation of ten-digit dialing in the Kansas City MSA will make an additional five million telephone numbers available for use by telecommunications service providers.¹⁵ SBC states that approximately 684 protected NXX codes exist in the eight-state service territory that SBC serves as an incumbent.¹⁶

¹⁴ See, e.g., BellSouth at 17.

¹⁵ AT&T at 36, n. 76.

¹⁶ SBC at 100, n. 189

Freeing up these protected resources is one of the most immediate and straightforward ways for the Commission to make additional numbering resources available in metropolitan areas where additional resources are needed most.

In addition, implementation of ten-digit dialing would encourage state commissions to implement area code relief based on maximizing the availability of numbering resources, rather than preserving seven-digit dialing. As noted, existing rules require mandatory ten-digit dialing for all calls in areas in which area code overlays are implemented.¹⁷ However, the desire to preserve seven-digit dialing may cause state commissions to favor geographic splits over area code overlays.¹⁸ Rather than eliminate the ten-digit dialing requirement for overlays, as some carriers suggest,¹⁹ Allegiance believes that expanding the ten-digit dialing requirement to geographic splits would maximize numbering conservation flexibility by substantially removing the ten-digit dialing issue from the conservation debate. Instead, interested parties could focus attention on number allocation and utilization.

Full implementation of ten-digit dialing will be a necessary precursor to the eventual expansion of the NANP. All expansion plans presently before the Industry Numbering Committee assume nationwide ten-digit dialing. Thus, to lay the groundwork for NANP

¹⁷ *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, Second Report and Order and Memorandum Opinion and Order, 11 FCC Rcd 19392, ¶ 287 (1996).

¹⁸ *NPRM* at ¶ 122 (noting that “[t]here is often significant customer resistance to ten-digit dialing, which may explain why more state commissions have chosen to implement splits rather than overlays”).

¹⁹ *SBC* at 101.

expansion, it makes sense to begin implementing ten-digit dialing when geographic splits are implemented.

C. To The Extent That TBNP Is Required, The Commission Should Establish National Pooling Guidelines

If the Commission does require number pooling, Allegiance supports the Pennsylvania Public Utility Commission's ("PaPUC's") suggestion that the Commission "establish national guidelines for mandatory thousand-block pooling and select a Pooling Administrator."²⁰ According to the PaPUC proposal, states would have the ability to opt into or out of the Commission's nationwide pooling scheme for NPAs in their states.²¹ State commissions would have the authority to require carriers to return unused or underutilized numbers to the NANPA in thousands blocks.²² In constructing this type of national number pooling framework, the Commission would maintain national uniformity and provide state commissions with the flexibility to respond to state-specific needs, consistent with the federal-state framework outlined in the *Pennsylvania Order*.

In establishing TBNP guidelines, Allegiance submits that the Commission should continue to follow basic principles of competitive and technological neutrality. In the first instance, the Commission should ensure that all carriers have access to at least one clean NXX

²⁰ PaPUC at 15. See also WinStar at 21 ("Absent a nationally designed system, the cost to service providers of operating on a nationwide basis of implementing 50 different pooling methods would be astronomical and prohibitive.").

²¹ PaPUC at 15.

²² *Id.* See also California Public Utility Commission at 17.

code per rate center in a given state. Such a requirement would encourage state commissions to implement rate center consolidation and ten-digit dialing to the extent practicable. In addition, allowing all carriers access to one clean NXX code per NPA would minimize numbering-related costs incurred by small carriers and carriers new to a given market. As for additional "growth" NXX codes in a rate center, Allegiance would support applying fill rates to all LNP carriers (incumbents and competitors) for triggering TBNP.

To satisfy principles of competitive neutrality, Allegiance supports the view that incumbents should have a higher NXX fill rate than competitors for TBNP purposes.²³ Incumbents, due to their legacy monopoly position, typically have higher number utilization in NXXs than new entrants. If the same fill rate were used for both incumbents and competitors, competitors would be forced to incur substantially more of the administrative costs associated with pooling than incumbents, solely because competitors are new to local exchange markets. Such a result would allow incumbents to avoid the costs of number pooling as a result of their legacy monopoly positions, and thus must be rejected as anticompetitive and discriminatory.

IV. ADMINISTRATIVE REQUIREMENTS SHOULD NOT INADVERTENTLY DELAY THE DEPLOYMENT OF COMPETITIVE SERVICES

Allegiance agrees with the Commission that more discipline is needed in distributing numbering resources to carriers.²⁴ For example, in assigning numbering resources, Allegiance supports efforts to ensure that requesting entities are legally certified to provide

²³ See e.g., *NPRM* at ¶ 189 (suggesting that an ILEC contamination level of 25% and a competitor contamination level of 10% would be nondiscriminatory). See also, RCN at 14.

²⁴ *NPRM* at ¶ 36.

service in a given state or that the requesting entities have applied for certification. As for obtaining additional NXX codes in an area, Allegiance would support the submission of basic utilization data.

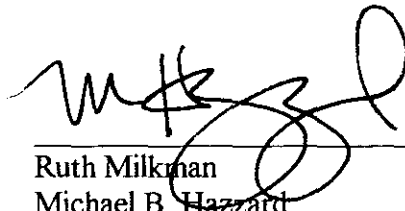
At the same time, however, Allegiance is concerned with suggestions of some commenters, such as SBC, that the NANPA require carriers to demonstrate that they are “prepared to place the code ‘in service’ by their requested activation date.”²⁵ While being required to demonstrate a concrete interconnection plan is reasonable, the Commission must recognize that physical interconnection of a competitor’s network with an incumbent’s network is a laborious and sometimes unpredictable process, which is largely controlled by the incumbent. Thus, while a showing that a carrier is in the process of interconnecting with an incumbent may be reasonable, physical interconnection should not be required before a carrier can receive an initial NXX in a given rate center. Any other result could artificially delay the deployment of competitive services.

²⁵ SBC at 43.

V. CONCLUSION

Consistent with the discussion presented herein, Allegiance submits that the Commission should delegate additional measured authority to state commissions and the NANPA in accordance with the guiding principles set forth in the Commission's *Pennsylvania Order*.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ruth Milkman', is written over a horizontal line.

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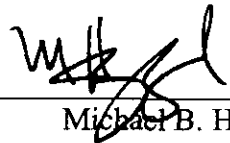
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Mark J. Burzych
Foster Swift Collins & Smith, PC
313 South Washington Square
Lansing, MI 48933-2193

Douglas F. Carlson
P.O. Box 12574
Berkeley, CA 94712-3574

CERTIFICATE OF SERVICE

I, Michael B. Hazzard, do hereby certify that on this 30th day of August, 1999, I caused a copy of the foregoing Comments of Allegiance Telecom to be served upon each of the parties listed on the attached Service List by first class mail, postage paid and by messenger.



Michael B. Hazzard

* By Messenger